

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

FACTORY MUTUAL INSURANCE	:	Civil Action No. 05-096 JJF
COMPANY, a/k/a FM GLOBAL a/s/o Catalog	:	
Resources, Inc. d/b/a ClientLogic, a subsidiary	:	
of ClientLogic Operation Corporation,	:	JURY OF TWELVE DEMANDED
	:	
and	:	
	:	
THE HARTFORD a/s/o Vivre, Inc.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
EAST COAST ERECTORS, INC., et al.	:	
	:	
Defendants.	:	

**NOTICE OF DEPOSITION DUCES TECUM\***

TO: All Counsel

PLEASE TAKE NOTICE that on the undersigned counsel will take the deposition ***Duces Tecum*** of the Records Custodian for LBC International Certified Public Accountants, LLP on Monday, August 1, 2005 beginning at 10:00 a.m. in the offices of Wetzel & Associates, P.A., located at The Carriage House, Suite 201, 1100 North Grant Avenue, Wilmington, Delaware 19805.

**\*DUCES TECUM**: Deponent is to produce for inspection and copying at the time of the deposition, all documents and tangible things identified in the attached Exhibit A.

***NOTE: Personal appearance is waived if complete copies of all requested documents are received in the law office of Wetzel & Associates, P.A. prior to the date of the deposition.***

WETZEL & ASSOCIATES, P.A.

/s/ Natalie M. Ippolito

Benjamin C. Wetzel, III (I.D. No. 985)

Natalie M. Ippolito (I.D. No. 3845)

The Carriage House, Suite 201

1100 N. Grant Avenue

Wilmington, DE 19805

(302) 652-1200

nippolito@wetzellaw.com

Robert B. Hill, Admitted Pro Hac Vice

MCLAIN & MERRITT, P.C.

3445 Peachtree Road N.E., Suite 500

Atlanta, GA 30326

*Attorneys for Defendant East Coast  
Erectors, Inc.*

Dated: July 20, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2005, I electronically filed DEFENDANT EAST COAST ERECTORS, INC.'S NOTICE OF DEPOSITION DUCES TECUM\* with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

Victoria K. Petrone, Esquire  
Tighe, Cottrell & Logan, PA  
PO Box 1031  
Wilmington, DE 19899

Bruce W. McCullough, Esquire  
McCullough & McKenty  
1225 N. King Street, Suite 1100  
P.O. Box 397  
Wilmington, DE 19899-0397

James F. Bailey, Jr., Esquire  
Bailey & Associates  
Three Mill Road, Suite 306A  
Wilmington, DE 19806

I hereby certify that on July 20, 2005, I mailed by United States Postal Service, the document to the following non-registered participants:

David L. Baumberger, Esquire  
Chrissinger & Baumberger  
Three Mill Road, Suite 301  
Wilmington, DE 19806

Geoffrey W. Veith, Esquire  
Rogut, McCarthy & Troy, LLP  
Once First Avenue, Suite 410  
Conshohocken, PA 19428

WETZEL & ASSOCIATES, P.A.

/s/ Natalie M. Ippolito  
Natalie M. Ippolito (I.D. No. 3845)  
The Carriage House, Suite 201  
1100 N. Grant Avenue  
Wilmington, DE 19805  
(302) 652-1200  
nippolito@wetzellaw.com